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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LESLIE R. LEONARDO
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00279-CWH

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF'S
MOTION FOR**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from July 5, 2018 to **August 15, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel had a death of a family member and is attending prayer services in the next few weeks. In addition, Counsel has over 85+ pending social security cases, which require two or more dispositive motions a week until mid-August. Due to current workload demands and upcoming leave, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion for Remand. Defendant makes this request in good faith with

1 no intention to unduly delay the proceedings. The parties further stipulate that the Court's Scheduling
2 Order shall be modified accordingly.
3

4 Respectfully submitted,

5 Dated: June 29, 2018

6 /s/ *Edward A. Wicklund
7 (*as authorized by email on June 29, 2018)
8 EDWARD A. WICKLUND
9 Attorney for Plaintiff

10 Dated: June 29, 2018

11 DAYLE ELIESON
12 United States Attorney
13 DEBORAH LEE STACHEL
14 Regional Chief Counsel, Region IX
15 Social Security Administration

16 By /s/ Tina L. Naicker
17 TINA L. NAICKER
18 Special Assistant U.S. Attorney
19 Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED: Defendant shall have until August 15, 2018 to respond to
22 plaintiff's Motion for Reversal and Remand (ECF No. 18).
23

24 DATED: July 5, 2018

25 
26 HON. CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR**
4 **DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via
5 the method of service identified below:

6 **CM/ECF:**

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20 Attorneys for Plaintiff

21 Respectfully submitted this 29th day of June 2018,

22 /s/ Tina L. Naicker
23 TINA L. NAICKER
24 Special Assistant United States Attorney
25
26